

**U.S. Department of Energy
Ohio Field Office**

**POLICY STATEMENT
OH P 440.1-1**

09-24-98

**SUBJECT: PREVENTING ACTS OF AGGRESSION, THREATENING BEHAVIOR,
AND VIOLENCE IN THE WORKPLACE**

BACKGROUND

The Centers for Disease Control and Prevention recognizes workplace violence as a serious occupational problem. In a June 1996 report, the National Institute for Occupational Safety and Health (NIOSH) published data that revealed homicide has become the second leading overall cause of occupational injury and death, exceeded only by motor-vehicle related deaths. This report also identified homicide as the leading cause of occupational injury and death for female workers. The Bureau of Labor Statistics notes the seriousness of workplace violence in their 1994 report, which states that of every four full-time workers, one is harassed, threatened, or attacked on the job each year. Many incidents can be avoided by employees who are able to recognize early warning signs of potential violence, know when and how to report concerns, and know how to implement the steps to defuse situations before they become violent.

PURPOSE AND SCOPE

The purpose of this policy is to provide a safe workplace free from aggressive, threatening, or violent acts through the development and implementation of an effective program that provides a safe workplace. The provisions of this Policy apply to all organizational elements of the U.S. Department of Energy (DOE) Ohio Field Office (OH) and its contractors and subcontractors at work sites owned and/or controlled by the OH and at which work is performed for the OH.

POLICY

It is the policy of the OH to provide a safe workplace for its employees, and that of its contractor and subcontractor employees. To this end, all OH organizational elements, and each OH contractor and subcontractor is expected to implement and maintain a program to prevent and respond to violence in the workplace. For purposes of this policy, violence is defined as the deliberate and wrongful violation, damage, or abuse of other persons, self, or property, and includes threats of violence. Acts of violence and threats thereof include, but may not be limited to: verbal (such as threats, harassment, abuse, and intimidating language), non-verbal (such as gestures and coercion), physical (such as hitting, pushing, shoving, kicking, touching, and assault), and other (such as arson, sabotage, vandalism, and stalking). It is important that all threats be taken seriously. All workers will have the right, without fear of reprisal to report acts of

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violence or threats to themselves or other employees.

In developing its program, the OH and each of its contractors and subcontractors shall consider the following:

1. A site-specific workplace violence policy and plan that includes written objectives and requirements for all organizational elements and incorporates the overall OH policy in identifying and addressing threatening workplace behavior. The policy will clearly indicate the zero tolerance for violence at work.
2. A review and approval of each site-specific plan by the cognizant Project Office Director, based upon the recommendation of the Workplace Violence Threat Assessment Team. Specific protocols to be considered in the approval of such plans include:
 1. Inclusion of Workplace Violence into site crisis assessment and emergency response planning to include all interested stakeholders and emergency first responders and security. (For a situation that poses an immediate threat of workplace violence, the site Emergency Response Organization, to include legal, human resources, employees assistance, and local law enforcement should be used to develop a response under the Operational Emergency Base Program);
 2. Maintenance and reporting of information on incidents of violence for review and analysis by the Compliance Division, Office of Compliance and Support. Data is essential for assessing the nature and magnitude of workplace violence and quantify risk. This data should be used to assess the need for action to mitigate risks for workplace violence and implement reasonable intervention strategy. For severe events, this will be accomplished through the Occurrence Reporting System in categories defined in Appendix A. For less severe events, Manager's and Supervisors should notify the Workplace Violence Threat Assessment team;
 3. Establishment of a procedure for employees to confidentially report threatening situations and other relevant information to management.
3. An awareness program for workplace violence prevention which should include:
 1. Initial awareness and response orientation and instruction for management and supervisors;
 2. Initial awareness orientation and information for workers, including new employee orientation as necessary;
 3. Refresher awareness training on an as needed basis for all employees;

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4. Development and conduct of a drill of the site crisis management system to respond to and mitigate a workplace violence scenario.
4. Written communication, in the form of an Occurrence Report, will be submitted from each OH site contractor to their respective OH Project Office of all incidents of violence meeting the criteria in DOE M 232-1A and this policy and the subsequent outcomes as the incidents occur. For less severe events not requiring an Occurrence Report, sites will provide written information using the ORPS format to the Workplace Violence Threat Assessment Team. This information is forwarded in accordance with existing Occurrence Reporting procedures and will be devoid of individual identification to ensure confidentiality. For the purposes of documenting workplace violence, each OH organizational element should report incidents of violence involving Federal employees and their subsequent outcomes through the protocol established above. Reports should be generated by the site where the event physically occurs.

RESPONSIBILITIES

1. Manager, Ohio Field Office. Establishes policy for the prevention of, response to and recovery from incidents of workplace violence at all OH sites.
2. Project Directors. Require implementation of a program by their contractors and review and approve contractor implementation plans. Ensure all incidents and threats of workplace violence are reported to the Workplace Violence Threat Assessment Team in accordance with this policy and established site plans.
3. All Employees, Federal, contractor and sub contractor. Review and understand the definition of workplace violence. Understand and support the zero tolerance policy for workplace violence. Report instances of workplace violence in accordance with this policy and any locally developed plans.
4. Director, Compliance Division. Provides specific guidance to OH Project Directors for OH contractor implementation of this program. Provides guidance for implementation of this program for DOE-OH employees. Consolidates information on workplace violence incidents and outcomes into a consolidated OH report for analysis and trending. Implements and maintains an OH Workplace Violence Threat Assessment Team.
5. OH Contractors and Subcontractors. Develop and implement a plan incorporating the OH requirements for prevention of, response to, and reporting of workplace violence.

6. Ohio Field Office Workplace Violence Threat Assessment Chairperson. Assembles Threat Assessment Team in response to specific incidents or threats. Conducts periodic Threat Assessment Team meetings. With the assistance of the team, provides technical support to Director, Compliance Division, for review and recommendation of site-specific contractor implementation plans. Provides necessary support for compilation and analysis of comprehensive OH-wide information on incidents and threats.
7. Ohio Field Office Workplace Violence Threat Assessment Team. With membership from the functional offices within the Ohio Field Office, this team consists of technical personnel from Safety, Diversity, Industrial Relations, Transportation, Chief Counsel, Security, Emergency Management, Public Affairs and Human Resources. Responsibilities include;
 - a) Develop and carry out a framework of activities to prevent or mitigate instances of personal violence at work. Establish reasonable goals and standards for employee awareness and conduct; management training; intervention; referral; and incident/post incident management;
 - b) Provide support to OH management on specific cases of concern that may compromise the safety of employees;
 - c) Assess the potential for violence for the specific work setting, identify potential threats and take action to mitigate these threats;
 - d) Assess the OH's preparedness to deal with events and set up a system to respond to all incidents of workplace violence;
 - e) Develop, review and carry out policies, threat reporting protocol, case management, and procedures for Post Traumatic Recovery.

IMPLEMENTATION

All OH organizational elements and their contractors will incorporate the provisions of this policy into their responsibilities, organizations, management processes and missions as needed to ensure effective implementation of this policy.

REFERENCES

Violence in the Workplace: Risk Factors and Prevention Strategies, National Institute for

Occupational Safety and Health, Current Intelligence Bulletin 57, July 1996.
Bureau of Labor Statistics, Census of Fatal Occupational Injuries, U.S. Department of Labor,
1994.

Occupational Safety and Health Act of 1970.

29 U.S.C. § 654 (a), 1994.

DOE Order 440.1

DOE Order 151.1

DOE Order 232.1A

DOE Manual 232.1-1A

Manager, Ohio Field Office

APPENDIX A
POTENTIAL OCCURRENCE REPORTING CATEGORIES FOR
INSTANCES OF WORKPLACE VIOLENCE
(Ref DOE M 232.1-1A)

Potential Category by Group	Occurrence Level (E, UO, ON)	Example
Group 5, Safeguards and Security,	Sub-Category A2, Criminal Acts, UO or E* Sub-Category G3, Demonstration, Protests, UO or E*	Violent assault/battery, murder, or unjustified use of deadly force while on DOE property. Malevolent activities causing property damage or bodily harm.
Group 1, Facility Condition,	Sub-Category H5, Operations, UO or E*	Evacuation ordered of a facility in order to protect personnel from a disgruntled employee, or potential act of workplace violence
Group 3, Personnel Safety	Sub-Category A1-3, Occupational Injury, UO, 1-2, ON or E*	Personnel injuries meeting the criteria as a result of workplace violence
Group 10, Cross Category Items	Sub-Category C.1, Potential Concerns/Issues UO and C.1, ON or E*	An occurrence that may result in significant concern, by the press or general public. Any event resulting in initiation of a Type A or B investigation

ON = Off Normal Occurrence

UO = Unusual Occurrence

E = Emergency

*** NOTE Any of the events described above may be conservatively categorized as an Emergency depending on the severity and potential consequences of the event. The event classification by the site Emergency Response Organization is applicable under DOE Order 151.1 as an Operational Emergency Base Program Event. This type of event will not be further classified as an Alert, Site Area Emergency or General Emergency unless hazardous or radioactive material release or a potential release is indicated or observed.**